

EXHIBIT A

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

**COORDINATION PROCEEDING
 SPECIAL TITLE [RULE 3.400]**

SOCIAL MEDIA CASES

THIS DOCUMENT RELATES TO:

All Cases

*(Christina Arlington Smith, et al., v. TikTok
 Inc., et al., Case No. 22STCV21355)*

**JUDICIAL COUNCIL COORDINATION
 PROCEEDING NO. 5255**

Lead Case No. For Filing Purposes:
 22STCV21355

Judge: Hon. Carolyn B. Kuhl
 SSC-12

**PLAINTIFFS' GENERAL CAUSATION
 EXPERT DESIGNATION**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Plaintiffs hereby submit, pursuant to California *Code of Civil Procedure* section 2034.210,
et seq. this disclosure regarding general causation expert witness information.

The following retained experts are expected to offer opinion testimony at trial:

1. Kara Bagot, M.D.

1 University of California, Los Angeles
2 Department of Psychiatry & Biobehavioral Sciences
3 300 LA Medical Plaza, Suite 1100
4 Los Angeles, CA 30095

5 2. Dimitri Christakis, M.D., M.P.H.
6 University of Washington
7 Department of Pediatrics, Division of General Pediatrics
8 Seattle Children's Research Institute, Center for Child Health, Behavior and
9 Development
10 2001 Eighth Avenue, Suite 400, M/S CW8-6
11 Seattle, WA 9812

12 3. Drew Cingel, Ph.D.
13 373 Kerr Hall
14 Department of Communication
15 College of Letters and Science
16 University of California, Davis
17 One Shields Avenue
18 Davis, CA 95616

19 4. Gary Goldfield, Ph.D.
20 Healthy Active Living & Obesity (HALO) Research Group
21 Children's Hospital of Eastern Ontario Research Institute
22 401 Smyth Rd.
23 Ottawa, ON. K1H 8L1

24 5. Anna Lembke, M.D.
25 Stanford University School of Medicine
26 Department of Psychiatry and Behavioral Sciences
27 401 Quarry Road
28 Stanford, CA, 9430

6. Ramin Mojtabai, M.D., Ph.D., MPH
Tulane University
Department of Psychiatry and Behavioral Sciences
1440 Canal St, Suite 1000
New Orleans, LA 70112

7. Stuart Murray, MSc., DClinPsych, Ph.D.
University of Southern California
Department of Psychiatry
2250 Alcazar Street
Los Angeles, CA 90033

8. Eva Telzer, Ph.D.
University of North Carolina at Chapel Hill
Department of Psychology and Neuroscience
Box #3270, 235 E. Cameron Ave

1 Chapel Hill, NC 27599

- 2 9. Jean M. Twenge, Ph.D.
3 San Diego State University
4 Department of Psychology
5 5500 Campanile Drive
6 San Diego, CA 9218

7 Pursuant to California Code of Civil Procedure section 2034.210, et seq., Plaintiffs state that
8 they may call one or more witnesses at trial who are not retained experts and are not required to
9 provide written reports but whose testimony may include information that could be considered
10 “expert testimony.” If called, the following witnesses are expected to testify as to their respective
11 backgrounds, professional observations, experiences and training, and consistent with the deposition
12 testimony previously given in this action:

- 13 1. Arturo Bejar
14 13950 Saratoga Vista
15 Saratoga, CA 95070
- 16 2. Vaishnavi Jayakumar
17 55 Suffolk Street, Apt. 2114
18 New York, NY 10002
- 19 3. Alison Lee, Ph.D.
20 4610 Hubbard Street, Apt. 710
21 Emeryville, CA 94608
- 22 4. Aza Raskin
23 1536 Oxford St.
24 Berkeley, CA 94709
- 25 5. Lotte Rubaek
26 Godhavnsvej 1
27 Hellerup, Denmark
- 28 6. Joshua Simons MP
c/o Joshua Levy
Levy Firestone Muse LLP
900 17th St. NW, Ste. 1200
Washington, DC 20006

Plaintiffs reserve the right to amend, withdraw, or supplement this designation as provided
by law, to call all experts designated by any other party to this action, to solicit opinion testimony

1 from custodians of records to the extent such testimony is needed for proper authentication of
2 records, and to call any additional experts to rebut or impeach expert or lay testimony.

3 In addition, Plaintiffs make this designation subject to the reservation of the following rights:

4 (a) the right to supplement this designation pursuant to California *Code of Civil*
5 *Procedure* section 2034.280, as well as any future rulings or decisions of the Court that affect the
6 scope of evidence in the trial;

7 (b) the right to expand this designation or designate new experts to respond to the
8 opinions offered by Defendants' experts in their depositions;

9 (c) the right to call at trial experts not previously designated and/or individuals
10 designated as experts by any other party in this action pursuant to California *Code of Civil Procedure*
11 section 2034.310; and

12 (d) the right to elicit any expert testimony at trial from any qualified person which would
13 be of benefit to the jury to determine material issues of fact pursuant to the California Rules of Civil
14 Procedure and California Rules of Evidence.

15 (e)

16 Further, by designating these general causation witnesses, Plaintiffs do not intend to waive
17 any objections to deposition testimony, exhibits, or other evidence or argument. Pursuant to the
18 agreement between the parties, these general causation expert designations are being served without
19 a formal declaration as would otherwise be included per California *Code of Civil Procedure* section
20 2034.260(c).

1 DATED: April 18, 2025

THE LANIER LAW FIRM, P.C.

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3 By:



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